U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION REPORT

HEADING I.

Date:

November 15, 2004

Subject:

Barry Bronze Bearing Inc.

Camden, Camden County, New Jersey

Removal Action: RV2

From:

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Removal Action Branch

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RST

POLREP NO.:

1 (Initial) [10/12/04 - 11/12/04] RV2

II. BACKGROUND

Site No:

UX

CERCLIS No:

NJC200400018

Response Authority:

CERCLA

NPL Status:

Not Listed or proposed

ROD Signed:

Not applicable

State Notification:

NJDEP Notified

Start Date:

October 12, 2004

Completion Date:

Ongoing

Status of Action Memorandum:

Signed on September 16, 2004

Delivery Order Number:

EP-W-04-054-02

III. SITE INFORMATION

Incident Category

CERCLA incident category: Inactive production facility

B. Site Description

1. Site description

The Barry Bronze Bearing (BBB)Company Site is located at 2204 South 7th Street, Camden, New Jersey 08104. The Site is approximately 0.6 acres in size and contains a 19,000 ft² industrial building which occupies approximately 80% of the property. The balance of the property is paved and was utilized for parking. The Site is accessed from 7th Street along its western boundary which is a residential setting with a church located at the corner. South of the Site are additional residences located on Florence Street. Adjacent to the Site to the East is a large warehouse complex operated by the City of Camden's Department of Education, and to the north lies Bulson Street and an active railroad. The portion of Bulson Street and the rail line between 7th and 8th Streets is situated on Block 578, Lot 1 (0.4 acres). North of Bulson Street is a 5 acre parcel of land owned by the City of Camden that is currently being developed for low income residential housing. A new housing development is located to the north-west of the Site.

BBB operated at this location from 1928 until operations were terminated in August, 1997. They manufactured a variety of metal castings which were made of different alloys. Spent foundry sands from the casting process were dumped behind the building along Bulson Street as road fill. Bulson street is an un-paved City Street.

2. Description of threat

EPA initiated a Removal Site Evaluation (RSE) on behalf of the City of Camden in April, 2004. During the RSE, samples were collected both inside and outside of the Site buildings. Metal contamination, mainly lead and arsenic were found to be at elevated levels both inside and outside. The facility is relatively secure and being maintained by the owner. There are no significant releases to the environment from the interior of the building. The contamination inside the building will not be addressed as part of this removal action. Contaminated soil along Bulson Street is located along the surface and poses a threat to any person who may traverse this area. An active railroad also bisects Bulson Street which may be aiding in the spread of contamination as dust.

C. Preliminary Assessment Results

During the RSE, samples were collected from Bulson Street approximately every 20 feet along 4 parallel lines between 7th and 8th Streets. The "A" line was adjacent to the BBB building, the "B" line was approximately along the southern limit of the Conrail easement, the "C" line was approximately along the northern limit of the Conrail easement and the "D" line was in the vacant lot adjoining Bulson Street to the north. Additional samples were collected west of 7th Street and east of 8th Street. Samples were collected from the 0" to 6" range with biased samples being collected to depths of 24". Approximately 150 soil samples in all were collected along Bulson Street as part of the RSE.

The results of the sampling indicate that lead contaminated soil in proximity to the BBB building along Bulson Street exists in significant concentrations and then diminishes eastward away from the building. The average concentration for lead along the "A" and "B" grid lines in proximity to the BBB building was 3,058 ppm. Concentrations along these same lines east of the BBB building averaged only 539 ppm. TCLP analysis of soil in proximity to the BBB building yielded results as high as 287 mg/l of lead. Similar results were reported for samples collected along the "C" grid line. The "D" grid line showed only background levels for lead.

IV. RESPONSE INFORMATION

A. Planned Response Actions

The planned scope of work for this action is to excavate and dispose of lead contaminated soil which exists along the surface of Bulson Street. The excavation will be based on data obtained during the RSE and also limited in depth to satisfy the safety requirements of the buried utilities (gas, electric and fiber optic) which underlie the area as well the proximity to the active rail line which bisects Bulson Street.

B. Situation

1. Current situation

The action memorandum was signed on September 16, 2004. An initial Site visit with ERRS was held on October 12, 2004. ERRS mobilized on October 25, 2004. Following a mobilization period and finalizing an access agreement with Conrail, excavation activities began on November 9, 2004.

2. Response activities to date: October 12, 2004 through November 12, 2004

The Removal Site Evaluation final report was completed on July 9, 2004. Contamination documented inside the facility will not be addressed as part of this removal action. Additional soil samples were collected from Bulson Street on August 5, 2004 to ascertain at what concentration samples would fail TCLP. Twelve samples were collected and based on reported results, concentrations exceeding 1,000 ppm for lead would result in failure of the TCLP test 5 mg/l. Soil failing TCLP will have a higher disposal cost and will be segregated during excavations to the extent possible.

Combining the new TCLP data and the RSE data, a cost estimate was prepared and incorporated into an action memorandum. The action memorandum was signed on September 16, 2004 by the ERRD Division Director.

The new ERRS contract became effective on September 15, 2004. A procurement request and task order were prepared and on September 27, 2004 the task order was formally issued to WRS.

On October 12, 2004, the OSC met on Site with assigned RM to review Site logistics, discuss planned removal activities and outline schedule and budget issues.

On October 25, 2004, ERRS mobilized a small crew and began Site preparation activities. This included removal of all vegetation in the planned work zones and staging areas. Office trailers, utilities and supplies were also secured as part of this activity.

During the weekend of November 6, 2004, the office trailers were vandalized. Several phones, fax machines, fire extinguishers and some personal items were stolen. A police report was filed on Monday, November 8, 2004, when the break in was discovered. Armed, off hours Site security was initiated that evening and will remain in place for the duration of the project.

On November 8, 2004, Conrail granted EPA access to their 36 foot wide Right of Way which bisects Bulson Street. Access was granted following discussions regarding health and safety, staging activities and final grading. EPA agreed to conduct field activities in accordance with Conrail protocols which included: utilizing a flagman, maintaining a 15 foot offset from the center line of the tracks and installing a drainage channel at the conclusion

of field activities on the north side of the tracks.

On November 9, 2004, the City of Camden Department of Sanitation was on Site to collect approximately 175 discarded tires which ERRS picked up from Bulson Street. ERRS also collected approximately 30 cubic yards of other debris from Bulson Street and staged them at the east end of the Site.

Excavation activities began on November 10, 2004. The planned excavation was divided into 9 grids, 6 south of the train tracks and the remaining 3 were north of the train tracks. The excavation is planned to be approximately 12 to 18 inches deep and span roughly 335 feet east of 7th Street on both the north and south sides of the train tracks which bisect Bulson Street. Please see attached diagram for reference. During this period, approximately 65 cubic yards of soil was excavated from grids A1 and B1. The excavated soil was staged at the east end of the Site in soil pile 1 for sampling and disposal.

On November 12, 2004, a 30 yard roll off box was mobilized. Non hazardous debris from Bulson Street was loaded and will be shipped off Site next period.

3. Enforcement

The owner of the BBB facility has been very cooperative with EPA. Formal access to conduct an RSE on the property was granted on March 23, 2004. On October 26, 2004, EPA issued a Notice of Potential Liability and Request for Information to the owner. The owner has stated that he is financially incapable of performing the planned mitigation actions. A decision to pursue the BBB owner or other potential PRPs for cost recovery actions is being evaluated by EPA.

C. Next Steps

EPA will continue with the excavation along the southern side of the tracks. Excavated soil will be sampled and disposed. Debris collected to date will be shipped off Site.

D. Key Issues

The excavation activities must proceed very cautiously due to the presence of buried gas, electric, sewer and fiber optic lines. An overhead power line along the south side of Bulson Street also exists. In addition, the access agreement with Conrail precludes staging any material within 15 feet of the center line of the track.

A Conrail flagman must also be used each day excavation activities occurs. Activity must stop while trains pass by the Site which occurs usually twice daily. Conrail flagmen are not always available and on days when they are not, excavation activities can not take place normally. Each of these factors serve to impede the pace at which field activities can occur.

Armed security guards are necessary safeguard the Site during off hours.

V. COST INFORMATION for RV2 only (As of, November 11, 2004)¹

a	Current Budget ²	Cost to Date ³	Amount Remaining
ERRS	\$300,000	\$58,880	\$241,120
RST	\$75,000	\$6,336	\$68,664
EPA	\$100,000	\$12,000	\$88,000
CONTINGENCY	\$92,000	\$0	\$100,000
TOTAL	\$567,000	\$77,216	\$497,784

- The cost accounting documented above is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.
- ERRS funding for this action was approved under procurement request with DCN# HE-0305, dated September 27, 2004, in the amount of \$300,000. RST, EPA and contingency budgets provided as part of action memo dated September 16, 2004.
- RST cost based on loaded estimated hourly rate of \$72/hour. EPA cost based on loaded estimated hourly rate of \$100/hour. ERRS cost are reported directly from corresponding 1900-55.

VI. DISPOSITION OF WASTES (During this Reporting Period)

Not Applicable this Period.

